



Jon L. Norinsberg
John J. Meehan

Diego O. Barros
Erica M. Meyer

110 East 59th Street
Suite 3200
New York, NY 10022

69-06 Grand Avenue
3rd Floor
Maspeth, NY 11378
diego@norinsberglaw.com

April 25, 2023

VIA ECF

The Honorable Zahid N. Quraishi, U.S.D.J.
Clarkson S. Fischer Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Ramnanan v. Keiffer, et al.
Civil Action No. 20 Civ. 12747 (ZNQ) (JBD)

Your Honor:

We represent the Plaintiff, Dr. Terry Ramnanan, in the above referenced civil rights action. We write now to advise the Court that, after careful consideration, we have elected not to file a Third Amended Complaint in this action. Rather, we have elected to file a new action in State Court, alleging solely state law claims under New Jersey law. To the extent that any federal claim for fabricated evidence remains and could have been alleged in a Third Amended Complaint, we now hereby move to voluntarily to dismiss that claim.

We thank the court for its consideration and attention to this matter.

Respectfully submitted,

Diego O. Barros, Esq.

Cc: All parties (via ECF)